EXHIBIT 87 REDACTED FOR PUBLIC FILING

```
1
                 UNITED STATES DISTRICT COURT
                 SOUTHERN DISTRICT OF NEW YORK
 2
 3
      IN RE: TERRORIST ATTACKS ) 03-MDL-1570 (GBD) (SN)
      ON SEPTEMBER 11, 2001 )
                                 )
 4
 5
 6
 7
 8
                   Wednesday, April 21, 2021
 9
                   THIS TRANSCRIPT CONTAINS
10
                     CONFIDENTIAL MATERIAL
11
             SUBJECT TO THE FBI PROTECTIVE ORDER
12
                        Redacted Pages
13
14
15
       Videotaped Deposition of ISMAIL AMMAR MOHAMED
     MANA, held in Santa Ana, California, commencing at
16
     8:07 a.m., on the above date, before Debra A.
     Dibble, Certified Court Reporter, Registered
17
     Diplomate Reporter, Certified Realtime Captioner,
     Certified Realtime Reporter and Notary Public.
18
19
20
2.1
22
                   GOLKOW LITIGATION SERVICES
                877.370.DEPS | fax 917.591.5672
23
                        deps@golkow.com
24
25
```

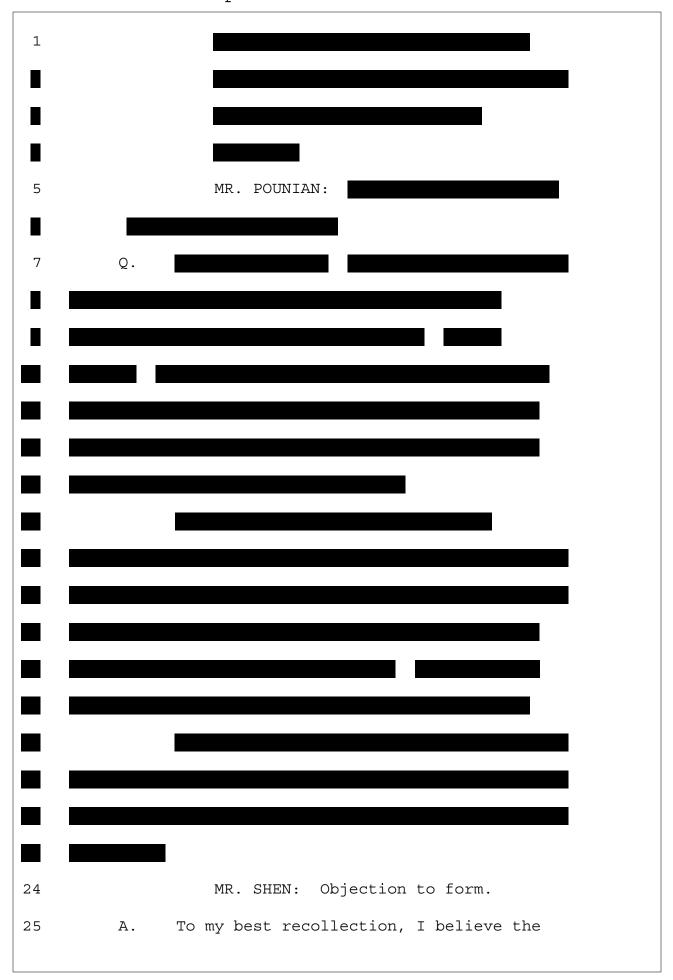
- 1 assist in any case, you know, in any emergency.
- Other than that, I didn't discuss the status of the
- 3 mosque with anyone.
- Q. All right, sir. If I could show you --
- 5 if we could mark as the next exhibit file seven,
- 6 please.
- 7 (Mana Deposition Exhibit 610 marked.)
- 8 Q. (BY MR. POUNIAN) Do you recognize this
- 9 photo, sir?
- 10 A. Yes. This is the library of the
- 11 King Fahad mosque.
- 12 Q. And where is it located?
- 13 A. It's by the entrance on the right side.
- 14 The main entrance for the men's side.
- Q. And did you ever use this library to do
- 16 any work?
- 17 A. Occasionally. Occasionally I sat down
- 18 there and check some references for my own
- 19 education.
- Q. And did you ever have meetings in this
- 21 room, sir?
- A. Myself?
- Q. Yeah. Do you recall there being meetings
- 24 held in this room?
- 25 A. I see sometimes people attending there,

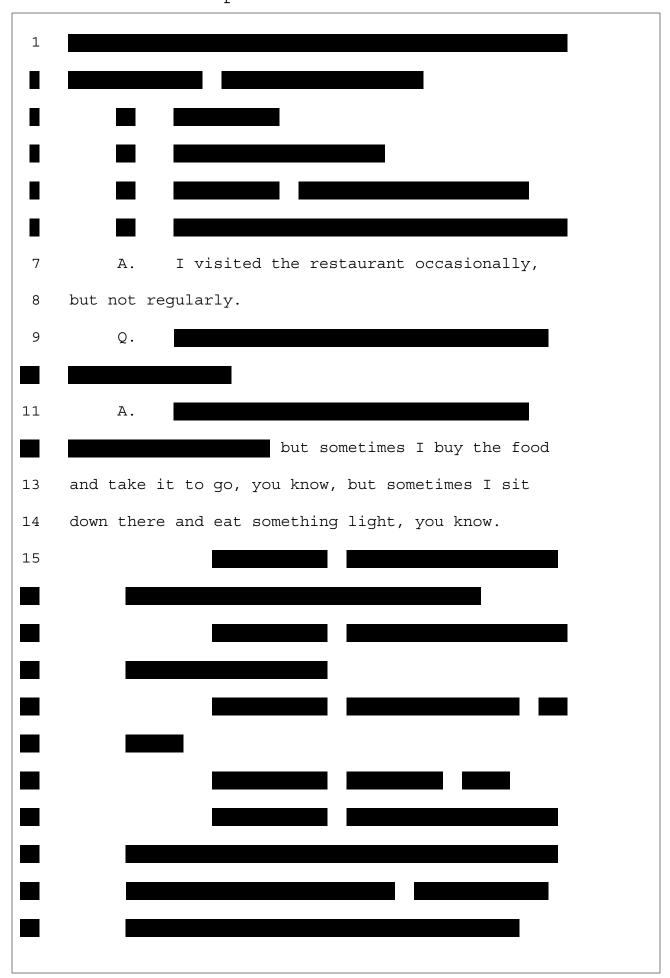
- 1 reading materials, but not meetings per se, you
- 2 know.
- 3 Q. And do you recall when -- who installed
- 4 the bookcases in this particular library?
- 5 A. I have no idea who sold them or who
- 6 purchased them or who installed them or who filled
- 7 them. None whatsoever.
- Q. Did there come a time in early 2000 when
- 9 you met Omar al-Bayoumi at the Los Angeles
- 10 consulate?
- 11 A. Omar al-Bayoumi came to the consulate for
- 12 any specific purpose of his. I don't know what it
- 13 was. He came to the Saudi affairs department, not
- 14 to my department.
- However, the secretary called me and she
- 16 said he had a guest with him who converted to Islam
- 17 and he wants to get some phonic material, like on
- 18 the Quran, some reading materials to educate
- 19 himself, being new in the faith. She said please
- 20 bring him some materials that benefits him. So I
- 21 did, and I went down and found him in the lobby
- 22 waiting by himself. I handed the package to him and
- 23 congratulated him and then moved to the secretary's
- 24 office. And I saw this Saudi quy there, I didn't
- even know his name, and I said, greetings, and then

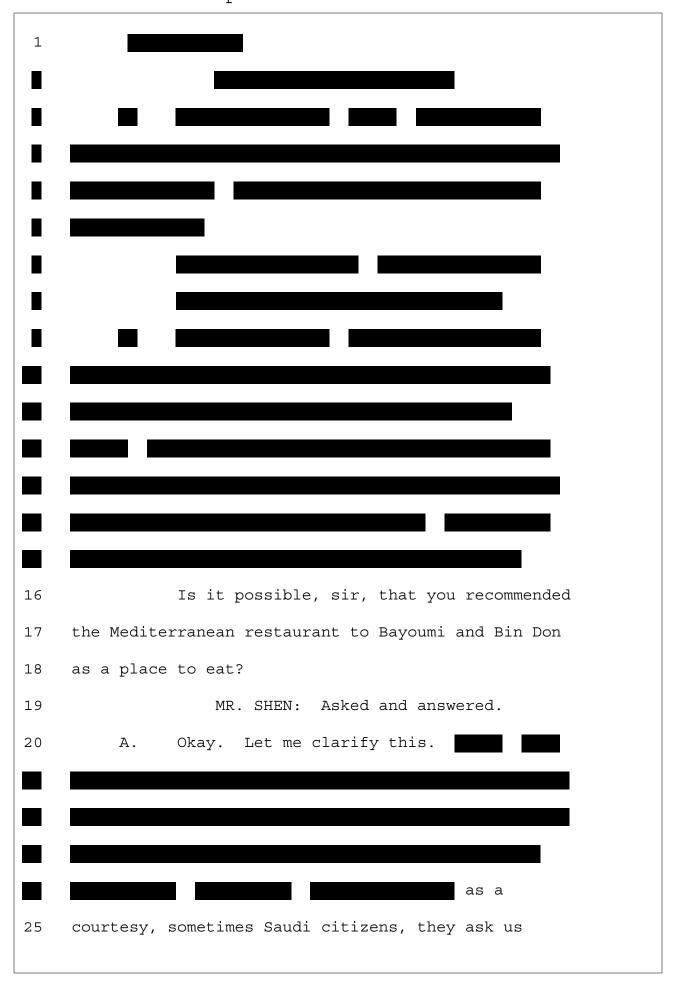
- 1 I told him, okay, the package has been delivered,
- 2 and I went back to my office. That's the brief
- 3 encounter with that guy. I didn't even know his
- 4 name at that time and on that particular moment
- 5 until way after the 9-11 happened and the newspapers
- 6 started writing articles about him and this and
- 7 that. And I found an article in the Asharg
- 8 Al-Awsat, which is an Arabic newspaper. I don't
- 9 know if it's funded by Saudis or who.
- 10 Anyway, this article mentioned the name
- 11 of a certain man who visited the consulate, and I
- 12 said, what? I went to the secretary and I asked
- 13 her, is this the guy that came with that convert?
- 14 And she said, yes. And I said, my God, I didn't
- 15 even know.
- 16 So I was quite shocked to hear that he
- 17 was the one who was interviewed by the FBI, I
- 18 believe in Saudi Arabia, even.
- And as such, you know, I -- that's the
- 20 moment I knew his name. But way after 9-11. When
- 21 he came to the consulate, I didn't even know his
- 22 name.
- 23 Q. All right, sir. So who is the secretary
- 24 that you just mentioned?
- 25 A. I believe it was the second one, Suhair

- 1 al-Bakri, at that time, if I am not wrong, because I
- 2 believe the previous one was sick and passed away, I
- 3 believe, from that illness.
- 4 Q. And what department was that? You said
- 5 the Saudi affairs department?
- A. Yes. It was on the first floor right by
- 7 the security desk.
- Q. And who is the head of that department,
- 9 sir?
- 10 A. I believe Dr. Sami was there at that
- 11 time.
- 12 Q. And you said the phone call came from
- 13 who, sir?
- 14 A. The secretary. She said, you know, I
- 15 have a Saudi guest here, and I had a guest with him,
- 16 and this guest is a new Muslim, and please bring him
- 17 some materials. So I collected the copy of the
- 18 Quran and some pamphlets, some small booklets that
- 19 explain the basics of the religion, and brought them
- 20 down to him. We didn't have, you know, volumes of
- 21 literature to get disbursed, but usually they give
- them to guests or some mosques or that's all.
- MR. POUNIAN:

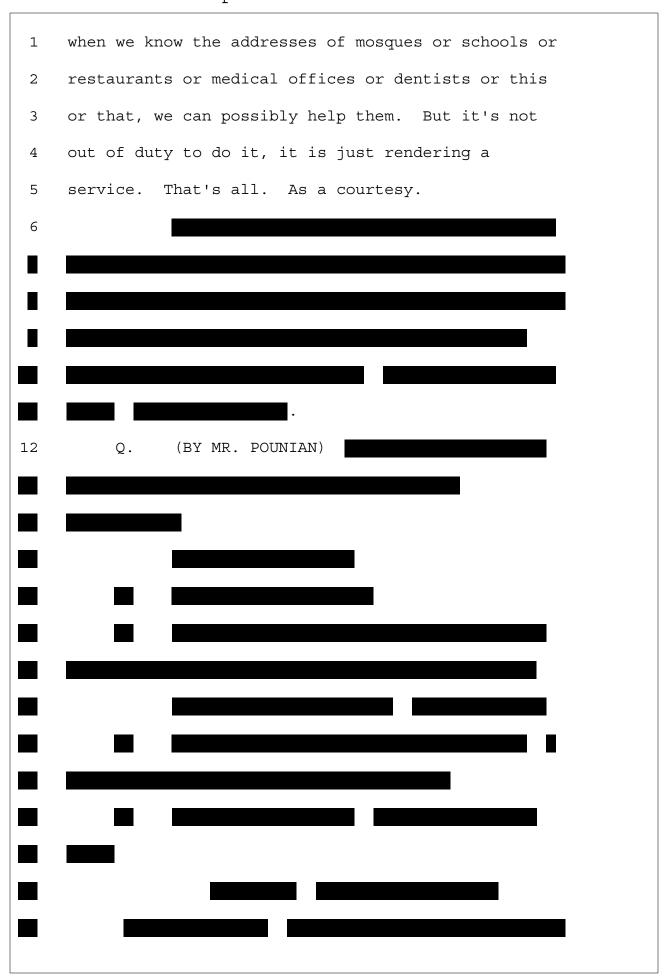
25 * * *

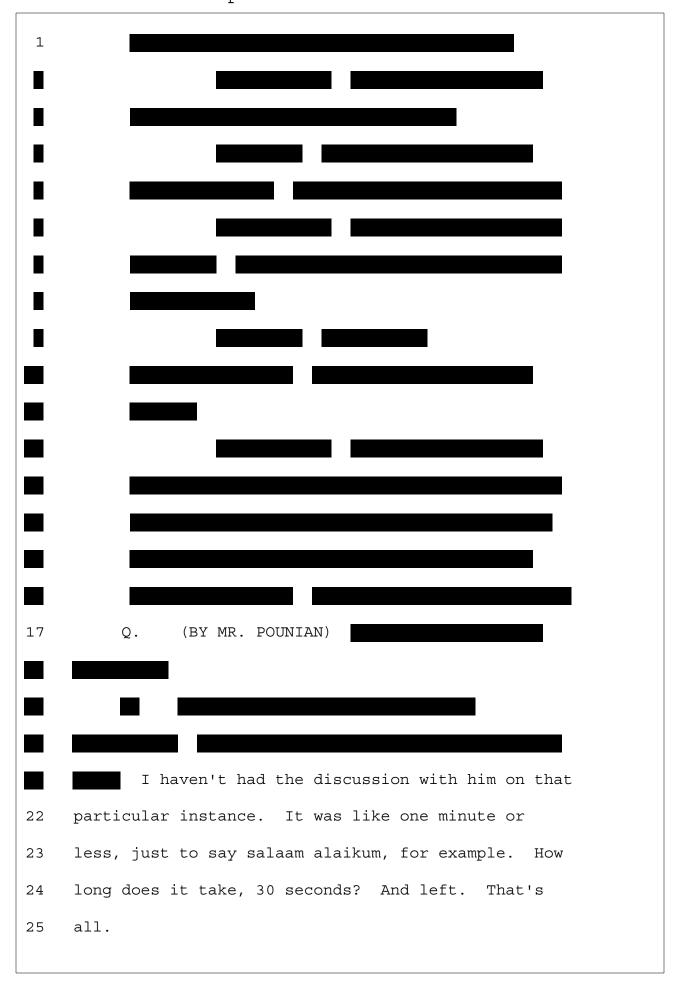




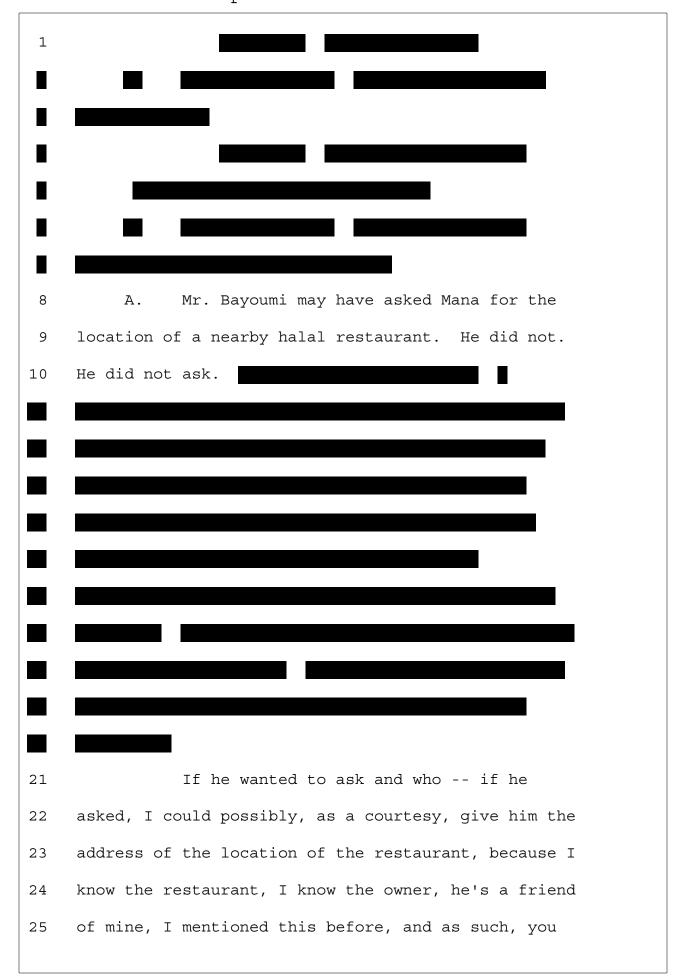


questions about specific businesses or medical 1 offices, dentists, whatever, hospitals. As a 2 courtesy, if we know, we can refer them to those 3 places. Okay? 4 5 As far as the restaurant is concerned, Mr. Bayoumi, like I said, I have a very, very, very, 6 and I repeat it is very brief encounter with him. I 7 cannot in one little minute get into a conversation 8 9 with him about restaurants or about mosques or about 10 consulate or about the -- any other business. I 11 haven't exchanged with him any discussion. if he asked, I would 25 have, as a courtesy, you know, from the consulate,





So is it your testimony, sir, that it was 1 Ο. 2 impossible for you to talk to Bayoumi about the 3 Mediterranean restaurant on that day? I didn't say it is an impossible. I said 4 Α. if he asked me as a courtesy, I may have given him 5 the address or showed him the directions how to go 6 7 That's a possibility. Because we do sometimes render service to Saudi citizens when they 8 9 are new and they don't know places where to go to 10 eat or to rent a hotel or to -- a hotel room or to 11 go to a hospital or to medical clinic, whatever. 12 You know, this we do, you know, every now and then when there's a request. But it's not part of our 13 We render this as just a courtesy, as a 14 15 service. You know? I could have told him: I don't 16 know, go and search for it on your own. That's it. 17 MR. POUNIAN: 20 (BY MR. POUNIAN)



know, I would render a small service in that case. 1 2 But as far as telling him to go there, to meet somebody there, no, no, no. I did not say that. 3 4 Because he 7 did not ask, and if he asked, I would have assisted on my own free will. Okay? I'm not obligated to 8 9 give him the address or give him the directions or 10 even accompany him to the restaurant. Okay? I 11 could have said, you're on your own. Go and find 12 the restaurant and eat. That's it. 13 Q. The point is, you don't recall -- you don't remember what you talked about that day; 14 15 right? 16 MR. SHEN: Objection. 17 Α. 20 Q. (BY MR. POUNIAN) I'm talking about your -- the moment 22 with Mr. Bayoumi at the consulate. You don't remember --23 I told you, it's a very brief encounter, 24 sir. I cannot give all of these details to a 25

gentleman that I just greeted and left. 1 2 Q. Okay. Α. 3 I haven't had the conversation with him. You don't recall what you said to 4 Q. Mr. Bayoumi on that occasion --5 MR. SHEN: Objection. 6 (BY MR. POUNIAN) -- what the conversation 7 Q. was. You have no recollection? 8 9 MR. SHEN: Objection. Misstates the 10 testimony and --I'm telling you I did not have a 11 12 conversation -- we did not have a conversation. No 13 question, no answers. Greeting and left. That's the only thing 14 15 that happened between me and him when he came at 16 that moment to the consulate with his guest. That's 17 all. He didn't ask for restaurant, he didn't ask for mosque, he didn't ask for any other issue that 18 19 might be of concern to him or of interest to him at all, at all. 20 21 Q. (BY MR. POUNIAN)

1 if he asked as a 5 courtesy I would possibly give him the address or the directions if he asked for directions or more 6 7 detail, but other than that, no, he did not ask me. 8 18 This is nonsense. I have never been 19 involved with terrorists, never directed anyone, never given any direction to anyone or a statement 20 that, you know, encourages these individuals to 21 commit their crimes. I abhor these acts. Okay? As 22 a true believer, if I found them I would chop off 23 24 their head before they commit their crime. I can tell you that. And I've said it to the FBI agents, 25

I told them if I knew about them, I would have 1 2 called you right away. To lock them and then bring 3 them to justice. What else can I say? 4 And I did not give them the address, I 12 did not give them directions at that time. 13 than that, I cannot add. 14 Q. 16 Α. 17 I didn't even know the guy. I never knew him. 18 status? What is he doing here in the U.S.? Is he a 19 student? Is he a businessman? Is he a patient that came for treatment, medical treatment? 20 tourist? Is he an official of the government? 21 have -- I have absolutely no idea who he was, what 22 status he had, and, you know, what position he had 23 24 in the government, if he had employment with the government. It's only afterwards that one of the 25

- 1 FBI agents in the meeting in Garden Grove that told
- 2 me, you know, that Mr. Omar Bayoumi was a spy on the
- 3 Saudi students in the United States? I said, sir,
- 4 you are teaching me something. I'm learning. These
- 5 are facts. I cannot hide them.
- 6 So please, you know, don't insist on
- 7 these encounters with Mr. Bayoumi, because I only
- 8 had the -- any deal with him at all individually
- 9 speaking. He came once in the consulate and then
- 10 became now subject of scrutiny and my citizenship
- 11 was canceled, my --
- 12 Anyway. Continue, sir. Sorry about
- 13 this.
- 14 Q.
- 17 A. Mr. Bin Don, when I met him, he asked me
- 18 that -- he was asked about me. Okay? I said, he
- 19 told me: What should I say. I said, sir, tell the
- 20 truth. And only a criminal lives in fear. I am not
- 21 living in fear because I'm not a criminal. Tell
- 22 them the truth, what you know, period. You came to
- 23 the consulate, you got some gifts, thank you, that's
- 24 it. That's the only encounter.
- The second encounter, he met me in a

- 1 Q. Did you discuss that with him?
- 2 A. Never. He's no longer at the King Fahad
- 3 mosque. I don't see him. I don't know where he is
- 4 right now.
- 5 Q. Was Dr. Khalil interviewed by the FBI?
- 6 A. They have a chat with him several times,
- 7 I believe, in Saudi and then here in the U.S. and
- 8 then with -- that is almost a regular practice, you
- 9 know, I would say.
- 10 Q. And what about Osman Kaldirim?
- 11 A. I'm not sure about Osman Kaldirim,
- 12 because he rarely comes to the U.S. He's from
- 13 Turkish origin. And he has his own business in
- 14 Turkey.
- Once in a while we'll see him there for a
- 16 few days and then he leaves again. But I'm not sure
- 17 if they contacted him.
- 18 Q. Was anyone at the consulate questioned by
- 19 the FBI?
- 20 A. I don't have any information on that,
- 21 whether they're from the officials or from the local
- 22 employees.
- 23 MR. POUNIAN: All right, sir. We
- have no -- I have no further questions at this
- 25 time.

```
1
                    THE WITNESS: Okay. Thank you very
 2
           much.
 3
                    MR. SHEN:
                    Can we pull up Exhibit 603, please?
 6
 7
                         _____
                          EXAMINATION
 8
 9
10
     BY MR. SHEN:
11
          Q.
                Good afternoon, Mr. Mana. My name is
12
     Andy Shen, and I'm a lawyer that represents the
13
     Kingdom of Saudi Arabia. I have just a few
14
     questions for you.
15
                We've placed on the screen Exhibit 603.
16
     Do you recognize this as your declaration?
17
          A.
                Yes.
                And if you could, please turn to page 8.
18
          Q.
19
     Is that your signature on page 8?
20
                Yes, it is.
          Α.
                And is that the date that you signed it,
21
          Q.
22
     November 2nd, 2019?
23
          Α.
                Yes.
          Q.
                And are all the statements in this
24
     declaration true and accurate?
25
```

```
MR. POUNIAN: Objection.
 1
                To my knowledge, yes.
 2
          A.
 3
                    MR. SHEN: I have no further
        questions. Thank you.
 4
                    THE WITNESS: You're welcome.
 5
6
                    MR. POUNIAN:
 8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
```

```
(Whereupon, all participants are now
 1
 2
                    present.)
                    MR. SHEN: I'm done. Anyone else?
 3
 4
           Let's make sure none of the other defendants
 5
           have questions.
 6
 7
                    We've finished our questioning.
           any of the other defendants have questions?
 8
 9
                    THE WITNESS: Is the question to me?
10
                    MR. SWIFT: No.
11
                    THE WITNESS: I'm sorry. Okay.
12
                    MR. SHEN: Mr. Swift, any questions
13
           from you?
14
                    MR. SWIFT: I do not have any.
15
                    MR. SHEN: Okay. I think we're done.
16
                    THE VIDEOGRAPHER: This concludes
17
           today's deposition of Smail Mana. We are
           going off the record. The time is 3:34 p.m.
18
19
                     (Time noted: 3:34 p.m. PDT)
                            --000--
20
21
22
23
24
25
```